



**Curtiss-Wright Corporation**  
4 Becker Farm Road  
Roseland, NJ 07068  
(973) 597-4700

December 7, 2005



Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: Response to Request for Information Pursuant to Section 104(e) of CERCLA  
for Safety Light Corporation Site, Bloomsburg, Pennsylvania**

Dear Mr. Steinmetz:

On or about November 8, 2005, Curtiss-Wright Corporation ("Curtiss-Wright") received the above referenced request from the United States Environmental Protection Agency, Region III ("EPA's Request"). EPA requested that Curtiss-Wright respond to the information request within thirty (30) calendar days of receiving the letter. Curtiss-Wright's response to the EPA's Request is provided below.

**General Response to the Information Request**

To prepare our responses to the EPA's Request, we searched for historical files pertaining to any business relationship that may have existed between Curtiss-Wright and Safety Light Corporation or any of its predecessor or affiliated companies including, but not limited to, U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal and Isolite (hereinafter collectively referred to as "Safety Light"). Our search failed to identify any documents or information that are responsive to the questions presented. As noted below, to the best of our knowledge and belief, all documents from the relevant time period were purged in accordance with internal policy and/or common practices at the time.

The only documentation that we are aware of that identifies a business relationship between Curtiss-Wright and Safety Light are the Safety Light Ledger Sheets provided to us with the EPA's Request (Enclosure 4), which indicate that Curtiss-Wright may have purchased useful products from Safety Light. From reviewing these Ledger Sheets, it appears that Curtiss-Wright purchased certain materials containing Ruthenium-106, Promethium-147 and Cobalt-60 from Safety Light between 1955 and 1963. The Ledger Sheets suggest that Safety Light shipped these products to the Wright Aero Division in Wood-Ridge, New Jersey and the Curtiss-Wright facility in East Patterson, New Jersey. These facilities were aircraft engine manufacturing facilities that may have

also played some role in the manufacturing of several prototype vertical takeoff and landing aircraft, which Curtiss-Wright was developing during the late 1950s and early 1960s. From reviewing the relevant documentation, it is clear that all transactions reflected in the Ledger Sheets are shipping entries where Safety Light shipped a useful commercial product to Curtiss-Wright. On one occasion, it appears that Curtiss-Wright returned a shipment of the delivered product to Safety Light (see Ledger Sheet No. 001323), but it is apparent from the context of this entry that Curtiss-Wright simply returned the product to Safety Light in the normal course of commerce.

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In summary, Curtiss-Wright's investigation identified no information relating to a relationship between Curtiss-Wright and the Safety Light Site. All available information indicates that Safety Light supplied useful product to Curtiss-Wright in the normal course of commerce, and that at no time did Curtiss-Wright arrange for the treatment or disposal of a hazardous substance or any other material at the Safety Light Site.

In addition to this general response, Curtiss-Wright's responses to the specific questions presented in EPA's Request are provided below.

### **Specific Responses to the Information Request**

Response to Question No. 1: Curtiss-Wright's investigation identified no information that describes any current or past business relationship between Curtiss-Wright and Safety Light. However, based on the Ledger Sheets provided by EPA, and given the nature of each company during the relevant time period, it is likely that Curtiss-Wright purchased the referenced material from Safety Light in support of its aircraft engine manufacturing business. The Curtiss-Wright facilities referenced in the Ledger Sheets were manufacturing facilities for reciprocating and turbine aircraft engines and may have been involved with the manufacturing of one or more of the prototype vertical takeoff and landing aircraft that Curtiss-Wright manufactured during the late 1950s and early 1960s. As noted above, it appears that the only business relationship between Curtiss-Wright and Safety Light was that of purchaser and supplier, where Curtiss-Wright occasionally purchased useful product from Safety Light in the normal course of commerce.

Response to Question No. 2: To the best of its knowledge and belief, Curtiss-Wright did not transport or broker hazardous substances or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

Response to Question No. 3: Not applicable. See response to Question No. 2 above.

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Response to Question No. 4: To the best of its knowledge and belief, Curtiss-Wright did not generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

Response to Question No. 5: Not applicable. See response to Question No. 4 above.

Response to Question No. 6: Curtiss-Wright is not aware of any person(s) that may be able to provide more detailed or complete responses to any questions contained in the information request or who may be able to provide additional responsive documentation to the information request. Curtiss-Wright sold the East Patterson facility in the 1960s and closed the Wood-Ridge facility in the 1980s. Curtiss-Wright is not aware of any current employees that have institutional knowledge of the manufacturing activities that took place at either facility in the 1950s and 1960s.

Response to Question No. 7: Curtiss-Wright has no knowledge of the whereabouts of any responsive documents as noted in Question No. 7.

Response to Question No. 8: Curtiss-Wright has no knowledge or information about any other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.

Response to Question No. 9: As noted above, no records relating to Curtiss-Wright's relationship with Safety Light or to the East Patterson or Wood-Ridge facilities have been located. Although Curtiss-Wright has not located information relating to how or when these historic files may have been purged, they likely were handled in accordance with then-current corporate policies and/or common practices. As requested, enclosed is a copy of Curtiss-Wright's current Record Retention Policy and Schedules ("Policy") (see Exhibit 1). As demonstrated by the Policy, the record retention periods for the categories where responsive documents may have been maintained have long since expired.

In conclusion, our investigation failed to identify any documents or other information responsive to EPA's Request. Based on the information provided in the Ledger Sheets, it is apparent that Curtiss-Wright's relationship with Safety Light was nothing more than a purchaser-supplier relationship, whereby Curtiss-Wright purchased various materials from Safety Light.

Please note that in providing the responses to the EPA's Request above, Curtiss-Wright does not waive, and specifically reserves, any and all objections, rights and defenses that it may have with respect to this matter. In providing these responses,

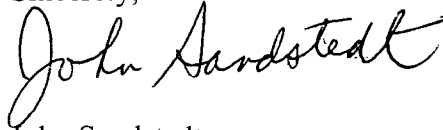
**CURTISS  
WRIGHT**

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
December 7, 2005  
Page 4

Curtiss-Wright does not purport to have adopted or applied any definitions or instructions set forth at the outset of, or at any other place in, EPA's Request to the extent that they may be in conflict or inconsistent with EPA's statutory authority under CERCLA.

If you have any questions regarding this response, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "John Sandstedt". The signature is written in a cursive style with a large, stylized "J" and "S".

John Sandstedt  
Environmental Manager

**CURTISS  
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Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
December 7, 2005  
Page 5

EXHIBIT 1

CURTISS-WRIGHT RECORD RETENTION POLICY AND SCHEDULES



# **CURTISS-WRIGHT CORPORATION**

## **Policy No. 5**

### **RECORD RETENTION POLICY AND SCHEDULES**

**(Revised April 2005)**

For purposes of this Policy, the word "Company" shall mean both Curtiss-Wright Corporation and its wholly-owned subsidiaries, and the word "employee" shall mean an officer or other employee of Curtiss-Wright Corporation or of any of its wholly-owned subsidiaries.

The Company's policy is to retain only those records which are required for the effective running of our businesses and to meet our obligations to customers, employees, the government and our shareholders. Toward that end, the retention guidelines that follow provide the retention period for all records---whether they are in a records retention center, a file room, a file cabinet or a computer drive, tape or disk - regardless of location or form. Records should only be stored at Company facilities. They should not, for example, be kept at employee's homes except during limited periods for which they might be required in connection with the performance of Company projects there.

All E-mail residing in system created folders, specifically the user's Inbox, Deleted Items box and Sent Items box shall be automatically deleted after no more than sixty (60) days. Any E-mail records deemed to have administrative, legal, or fiscal retention requirements should be either printed out and saved as a paper document, filed electronically in an user created sub-folder on the network server, or saved as an electronic document on a network computer drive. No E-mails or Internet messages shall be stored on the individual workstation's hard drive. Company E-mail is not intended to be a permanent or archival record of Company activity, and should be retained only as long as reasonably required. E-mail and Internet messages that have no administrative, legal, or fiscal requirements for their retention shall be deleted as soon as they have served their purpose. Employees are responsible for periodic review and deletion of all unnecessary E-mail and Internet files from their folders, whether such E-mails reside in system created or user created folders.

Offices and record retention centers may use their own, individualized record retention manuals, provided they have been approved by the Law Department as being consistent with Corporation policy and these Records Retention Guidelines.

This Policy shall be suspended as to any documents that relate to a matter that is reasonably likely to be the subject of litigation or government investigation. Employees who receive information suggesting that litigation or an investigation may be initiated

against the Company or its subsidiaries should cease disposing of records pursuant to this Policy and contact the Company's General Counsel for further guidance.

For ease of use, the Retention Schedule is organized alphabetically by types of documents and the period for retention. When documents with varying retention schedules are filed as a unit, the retention period is determined by the document with the longest requirement. Records stored for extended periods should be reviewed periodically to assure they remain and are in usable condition.

Note that records will be discarded without further approval when the applicable retention period has expired. In any event, the "owner" of records should review them regularly and not less than annually to determine whether retention is still required. If exceptions are required due to litigation or government proceedings, the appropriate record center should be advised promptly so that the affected records will be retained until further notice. Tax records and audited financial statements are an exception and will be eliminated only after approval by the Tax Department.

Records retention centers are not to accept unedited files; i.e., it is the "owners'" responsibility to eliminate information copies, drafts and all other unnecessary papers from the files before they are placed in file storage.

The availability of computers has resulted in large quantities of information being stored on electronic media throughout the corporation. This can reduce storage costs, but can compound the even greater costs of record retrieval and reproduction. Thus, computerized data also shall be reviewed to eliminate duplicative material and material that is no longer needed.

The following abbreviations are used in the guidelines:

**ACT   ACTIVE**  
**CY    CURRENT YEAR**  
**IND   INDEFINITE**

**THIS POLICY SHALL APPLY PROSPECTIVELY. ANY QUESTIONS AS WELL AS RECOMMENDATIONS SHOULD BE ADDRESSED TO THE LAW DEPARTMENT.**

## RECORDS RETENTION PERIODS

<b>Function/Record</b>	<b>Typical Period</b>
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### **Accidents**

Claims	
ACT+07	
Insurance Correspondence	
ACT+01	
Reports	
CY+04	

### **Accounting**

#### **Accounts payable**

Accounts payable invoices	CY+04
Accounts payable ledgers	CY+04
Amortization records	CY+04
Bills	CY+04
Cash disbursements	CY+04
Commission statements	CY+04
Cost accounting records	CY+04
Cost sheets	CY+04
Cost statements	CY+04
Credit card charge slips	CY+04
Credit card statements	CY+04
Debit advices	CY+04
Donations	CY+04
Expense records	CY+04
Invoices	CY+04
Petty cash records	CY+04
Property taxes	CY+04
Purchase requisitions	CY+04
Royalty payments	CY+04
Travel expenses	CY+04
Unemployment insurance payments	CY+04
Vouchers	CY+04
Workers compensation insurance payments	CY+04

#### **Accounts Receivable**

Accounts receivable	CY+04
Accounts receivable ledgers	CY+04
Cash books	CY+04
Cash journals	CY+04
Cash receipts	CY+04
Cash sales slips	CY+04
Collection notices	ACT
Collection records	ACT
Credit advices	CY+04

Receipts	CY+04
Sales receipts	CY+04
Uncollected accounts	CY+04
<b>Benefits</b>	
Group Annuity Data	IND
Individual Retirement File	ACT+04
Individual Retirement Record	IND
Retirement Master Register	IND
<b>Capital Property</b>	
Acquisitions	CY+04
Appropriation requests	ACT+03
Capital asset records	CY+04
Damage Reports	CY+04
Depreciation schedules	CY+04
Fixed assets	CY+04
Material transfer files	CY+04
Mortgage payments	CY+04
Plant ledgers	CY+04
Property detail records	CY+04
Property inventory	CY+04
Property, sold	CY+04
<b>General</b>	
Account ledgers	CY+04
Accounting procedures	ACT+10
Balance sheets	CY+04
Books of accounts	CY+04
Credit applications	01
General ledger, annual	CY+04
General ledger, monthly	01
Journal entries	CY+04
Journals	CY+04
Ledgers	CY+04
Ledgers, subsidiary	CY+04
Registers	CY+04
Trial balances	CY+04
<b>Internal Audit</b>	
Audit Reports (external)	ACT+02
Audit Reports (internal)	ACT+02
Audit Work Papers	ACT+01
<b>Payroll</b>	
Authorization for Employment	ACT+06

Garnishment accounting	CY+04
Garnishment orders	ACT
Payroll checks	CY+04
Payroll history	CY+04
Payroll records	CY+04
Payroll registers	CY+04
Payroll reports to Federal State, and Local agencies	CY+03
Unclaimed Salaries and Wages	ACT+02

## **Administration**

### **General**

Authorizations, table of	ACT+10
Calendar books	01
Chronological files	01
Correspondence (see specific listing)	01
Directives	ACT+10
Feasibility studies	ACT
Organization charts	ACT
Policies	ACT+10
Policy statements	ACT+10
Procedure manuals	ACT+10
Reading files	01
Table of authorizations	ACT+10

### **Property/Facilities**

Appraisals	CY+10
Building permits	ACT+01
Deeds	
ACT+06	
Leases	
ACT+06	
Lease abstracts	ACT+01
Lease acquisitions	
ACT+01	
Maintenance records	
ACT+03	
Motor vehicle maintenance	ACT
Motor vehicle records	ACT
Office improvements	ACT
Office layout	ACT
Property summaries	
ACY+04	
Property title	
ACT+06	
Real estate records	ACT
Repair records	ACT
Sales	CY+10

Water rights	ACT+06
Zoning permits	ACT

### **Records Management**

Computer tape indexes	ACT
Record destruction documentation	10
Records inventory	01
Records management procedures	ACT+10

### **Security**

Badge lists	ACT
Employee clearance listings	ACT
Visitor registration	01

## **Business Organization**

### **Partnership**

Partnership agreements	ACT+06
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### **Corporation**

S.E.C. filing	10
Annual reports	IND
Articles of incorporation	IND
Board of directors meeting minutes	IND
Board of directors meeting notices	10
Bonds, surety	ACT+06
Bylaws	IND
Capital stock certificates	ACT+03
Capital stock ledgers	ACT+03
Capital stock records	ACT+03
Capital stock sales	ACT+03
Capital stock transfers	ACT+03
Certificates of incorporation	IND
Corporate reorganizations	10
Dividend records	10
Fidelity bonds	ACT+06
Incorporation records	IND
Minute books	IND
Proxies, signed	10
Quarterly reports	01
Shareholder meeting minutes	10
Shareholder meeting notices	10
Shareholder proxies	10
Stock ledgers	ACT+03
Stockholders meeting materials	10
Stockholders proxies	10
Stockholders, listing of	ACT+03
Voting records	10

### **General**

Business permits	ACT
Charters	IND

Licenses	ACT
Mergers	ACT+06

## **Communications**

### **Customer**

Advertising Contracts	ACT+05
Advertising Materials	ACT+05
Biographies of Company Personnel	03
Product literature and surveys	05
Promotional materials	05

### **Community/Shareholders**

Community relations material	03
Contributions Documentation	IND
Division/Subsidiary Newsletters	01
Mailings to shareholders	CY+10
Matching Gifts	05
Press Releases	CY+10
Speeches	03

## **Finance**

### **Banking**

Bank deposits	CY+04
Bank reconciliations	CY+04
Bank statements	CY+04
Check registers	CY+04
Check stubs	CY+04
Checks, canceled	CY+04
Deposit slips	CY+04
Wire transfers	CY+04

### **General**

Audit reports, external	03
Audit reports, internal	01
Budget work papers	01
Budgets – 1 year	CY+01
Budgets – 5 year	CY+05
Financial plan	ACT
Financial reports – annual	10
Financial reports – monthly	01
Financial statements	10
Financial statements, certified	10
Forecasts – 1 year	CY+01
Forecasts – 5 year	CY+05
Profit and loss statements	10
Profit reports	01

### **Investments/Insurance**

Bond investments	CY+04
Futures investments	CY+04
Insurance policies, active	ACT+06
Insurance policies, canceled	06
Inventory, property	CY+04
Investments	CY+04
Letters of credit	ACT+06
Mortgage records	ACT+06

Notes, canceled	06
Notes, outstanding	ACT+06
Notes, paid	06
Options contracts	ACT+06
Options and futures	CY+04
Securities sales	CY+04
Stock investments	CY+04

### **General**

Client files	ACT+06
Project files	ACT+03
Reference files	ACT

### **Information Systems**

#### **Computer Systems**

Computer Performance reports	CY+03
Systems development specifications	CY+05

#### **Telecommunications**

Systems Maintenance	ACT
System performance logs	

### **Legal**

#### **Contract Administration**

Agreements	ACT+06
Buy/sell agreements	ACT+06
Contracts, general	
Contract compliance	06
Contract documentation	ACT+06
Contracts, changes to	ACT+06
Employment contracts	ACT+06
Contracts, government	
Contract compliance	ACT+03
Contract documentation	ACT+03
Cost accounting	ACT+04
Cost reports	ACT+10
Pay administration	03
Procurement	04
Production	04
Salary administration	03
Contracts, property improvement	
Contract compliance	10
Contract documentation	ACT+10
Contracts, sale	
Contract compliance	04
Contract documentation	ACT+04
Easements	ACT+06
Joint Venture Agreements	ACT+06
Leases	ACT+06
Mortgages	ACT+06
Memorandum of Understanding	ACT+06
Patent agreements	ACT+06
Promissory notes	ACT+06

Teaming Arrangements	ACT+06	
Title documentation	ACT+06	
Warranties, product	ACT+06	
<b>General</b>		
Legal opinions	ACT+03	
Patent applications	ACT	
Patents	ACT+06	
Trademark records	ACT+06	
<b>Legal/Tax Compliance</b>		
Employment tax filings	CY+04	
Excise tax filings	CY+04	Income
tax filings	CY+04	
Sales tax filings	CY+04	
Tax returns	CY+04	
Tax returns, employment	CY+04	
Tax returns, excise	CY+04	
Tax returns, income	CY+04	
Tax returns, motor fuel	CY+04	
Tax returns, property	CY+04	
Tax returns, sales	CY+04	
Tax returns, unemployment	CY+04	
Tax returns, use	CY+04	
<b>Litigation/Claims</b>		
Affidavits	ACT	
Claims, affirmative action	ACT	
Complaints	ACT	
Court case files	ACT	
Court records	ACT	
Depositions	ACT	
Disputes	ACT	
Exhibits	ACT	
Grievances	ACT	
Litigation files	ACT	
<b><u>Personnel</u></b>		
<b>Benefits</b>		
Actuarial records	ACT+06	
Disability records	IND	
Education assistance files	06	
Employee benefits	06	
Employee relocation records	06	
Employee stock purchase agreements	ACT+06	
Government filings	07	
Group life and hospital claims	06	
Incentive plans	ACT+06	
Pension or 401(k) plan applications	IND	
Pension or 401(k) plan withdrawal, termination,		
Promotion, and distribution documents	IND	
Pension plan vesting files	IND	
Pension plans		ACT+06
Profit sharing plans		ACT+06
Retirement benefits		IND
Retirement plans		ACT+06
Service records		IND

Sick leave benefits accrued	06
Thrift plan reports	06
Years of services	IND

### **Equal Employment Opportunity**

Affirmative action plans	ACT
Form EEO-2	03
Racial/ethnic identification (Form EEO-1)	03
Communication/Hotline Logs	IND
Hotline Worksheets	ACT

### **General**

Attendance records	03
Collective bargaining agreement	ACT+06
Driving exams	ACT+03
Employee manuals	ACT+10
Job descriptions	ACT+10
Labor union contracts	ACT+06
Labor union grievances	CY+05
Labor union meetings	03
Performance standards	ACT+10

### **Health and Safety**

Accident reports	CY+05
Audiometric tests	03
Damage reports	CY+05
Emergency action plans	ACT
Employee exposure records	30
Employee medical complaints	CY+05
Employee medical records	ACT+30
Environmental monitoring records	CY+05
Environmental testing methodology	CY+05
Environmental testing reports	CY+05
Environmental testing worksheets	CY+05
Fire extinguisher records	01
Fire prevention programs	ACT
Hazard communications records	30
Hazardous exposure records	30
Hazardous substance identity records	30
Health and safety bulletins	CY+05
Health insurance claims	ACT
Injury reports	CY+05
Log, accident (OSHA Form 200)	CY+05
Log, injury (OSHA Form 200)	CY+05
Material safety data sheets	30
Medical records	ACT+30
Medical surveillance	30
Noise exposure measurements	02
Radiation exposure records	ACT+30
Safety records	CY+05
Supplementary records (OSHA Form 101)	CY05
Toxic substance exposure records	30

### **Personnel Actions**

Applications, hired	01
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Applications, rejected		01	
Apprenticeship records	02		
Demotion records	01		
Education records		01	
Employee evaluations		03	
Employment history current		IND	
Employment history, previous	03		
Employment summary records	IND		
Hiring records		01	
Job announcements		01	
Layoff records		03	
Personnel actions	03		
Personnel files, active		IND	
Personnel files, terminated	03		
Promotion records		03	
Tenure records	ACT		
Termination records		03	
Testing records	01		
Training records	ACT		
Transfer records	01		
Work appraisals	03		

### **Salary Administration**

Bonuses	01		
Cost of living records		01	
Earnings records		03	
Form W-2			CY+04
Form W-4			CY+04
Pay rates			ACT+03
Payroll deductions			CY+04
Salary surveys			ACT
Time cards			CY+04
Time sheets			CY+04
Wage rate tables		03	

### **Security**

Area Inspection Logs		01	
Clearance files		ACT+03	
Defense Investigative Service Inspections	CY+04		
Destruction Certificates	CY+03		
Document Passes	CY+03		
Employee ID Badges		ACT	
Loss of Classified Material Report	CY+05		
Receipt of Classified Material	CY+03		
Security Infraction Reports		CY+02	
Security investigative reports		IND	
Vehicle logs		CY+05	
Visitor Register	CY+03		

### **Production and Sales**

#### **Product Development**

Blueprints		ACT	
Design records		IND	
Engineering records			ACT
Laboratory reports			IND
Product design specifications			IND
Product testing		IND	

Production tool design records	ACT
Research records	IND
Testing reports	IND

### Production

Inspection records	IND
Product inventory	ACY+04
Production costs	01
Production reports	01
Production specifications	ACT
Quality control reports	IND
Warehouse inventory records	ACY+04
Work orders	ACT
Work status reports	01

### Public Relations

Advertising		ACY+01
Artwork	03	
Customer complaints		ACT
Government docket files	ACT	
Legislation, pending		ACT
Mailing lists		ACT
Market research data		ACT
Media packets		ACT
News releases		IND
Newsletters, internal		CY+02
Newspaper clippings		IND
Publicity photographs		ACT
Publicity records	IND	
Slide presentations		IND
Speeches		03

### Purchasing

Bids, accepted		ACT+06
Bids, rejected		01
Catalogs	ACT	
Price lists		ACT
Purchase orders	CY+04	
Quotations		01
Receiving documents		01
Vendor literature	ACT	

### Sales

Back order records		01
Customer credit files		ACT
Customer lists		ACT
Market surveys	ACT	
Marketing plans	ACT	
Orders		03
Orders, acknowledgment	01	
Price lists		ACT
Price proposals/quotations	ACT+01	
Proposals		ACT+01
Sales activity records		01
Sales records		01

Sales reports		01
Sales slips		CY+04
Service requests	01	

### **Shipping/Transportation**

Bills of lading		06
Export declarations		02
Freight records	06	
Packing lists		06
Shipping instructions		01
Shipping manifests		06
Shipping tickets	06	
Waybills		06

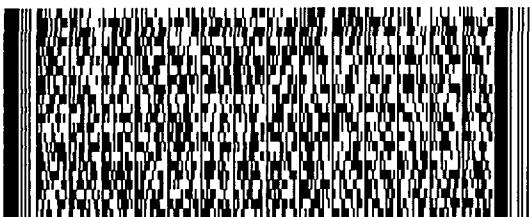
From: Origin ID: (973)597-4751  
Barbara Raia  
CURTISS-WRIGHT CORPORATION  
4 BECKER FARM ROAD

ROSELAND, NJ 07068



CLS 10270509/16

SHIP TO: (215)814-3161 **BILL SENDER**  
**Harry R. Steinmetz (3HS62)**  
**U.S. Environmental Protection Agency**  
**Region 3**  
**1650 Arch Street**  
**Philadelphia, PA 191032029**



Ship Date: 07DEC05  
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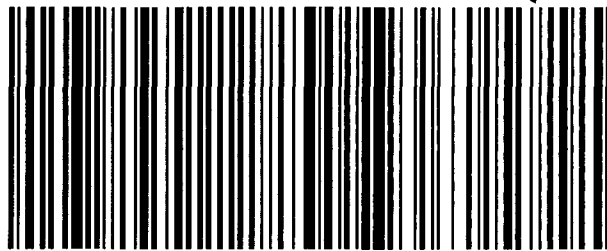
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